

MORVILLO, ABRAMOWITZ, GRAND, IASON, ANELLO & BOHRER, P.C.

ELIAN ABRAMOWITZ
 RICHARD F. ALBERT
 ROBERT J. ANELLO
 LAWRENCE S. BADER
 BARRY A. BOHRER
 GATHER-VE H. FOTI
 PAUL R. GRAND
 LAWRENCE IASON
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 BARBARA MOSES
 JOSH NEHER PERIN
 JONATHAN S. SACKS
 EDWARD H. SPIRO
 JEREMY H. TERRY
 JOHN J. THUE, JR.
 CYRUS R. WANCE, JR.
 RICHARD D. WEINBERG

*ALSO ADMITTED IN CALIFORNIA AND
 WASHINGTON, D.C.
 *ALSO ADMITTED IN SEVERAL OTHER STATES

565 FIFTH AVENUE
 NEW YORK, N.Y. 10017

TELEPHONE
 (212) 858-9600

WWW.ITVMDNY.COM

FACSIMILE
 (212) 858-9494

WRITER'S STREET DIAL
 (212) 880-9400
morvillo@maglaw.com

COUNSEL
 JUDITH L. MOGAL
 CHRISTOPHER J. MORVILLO
 E. SCOTT MORVILLO
 GREGORY MORVILLO
 SENIOR ATTORNEY
 THOMAS P. KEANE
 MICHAEL C. ROSENBERG
 (646) 288-2882

December 23, 2008

BY FACSIMILE AND FEDERAL EXPRESS

**FOIA CONFIDENTIAL
 TREATMENT REQUESTED**

Marianne Abely, Esq.
 Federal Election Commission
 999 E Street, NW
 Washington, DC 20463

Re: MUR 6840

Dear Ms. Abely:

We represent Fourth Lenox Terrace Associates ("Fourth Lenox") in connection with the above-referenced matter. We write in response to Susan Lebeaux's December 4, 2008 letter requesting that Fourth Lenox clarify the following statement from our November 14, 2008 submission:

Although only Congressman Rangel's name appeared on the lease for apartment 10U, at some time after November 1, 1996 Congressman Rangel's re-election campaign and political action committee started using the apartment as their offices.

Ms. Lebeaux states that is the Federal Election Commission's understanding that Congressman Rangel "sublet" apartment 10U to the Rangel for Congress committee and the National Leadership PAC ("the Committees"). We believe that this understanding is erroneous.

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Marianne Abely, Esq.
December 23, 2008
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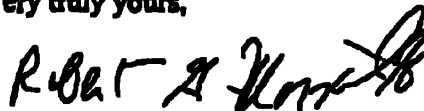
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Fourth Lennox has no correspondence or other documentation regarding a "sublet" between Congressman Rangel and the Committees. Nor did it consent to such an arrangement. At some point after Congressman Rangel leased apartment 10U in 1996, the Committees began paying the rent for 10U. See Exhibit A (containing copies of rent checks received from the Committees). These rent checks were not forwarded to the company but, in accordance with the company's procedures, were sent to a lock box. The rent checks sent to the lock box were then deposited directly into a bank account and Fourth Lennox management never had an opportunity to view them. Thus, while the lock box (to which every Fourth Lennox tenant sends their rent) accepted these rent payments from the Committees, Fourth Lennox management had no actual knowledge that the Committees were using the apartment for a campaign office until at least June or July of 2008. Indeed, it was always Congressman Rangel, and not the Committees, who renewed the lease for apartment 10U every two years.

Finally, as you know apartment 10U is a rent stabilized apartment. Thus, regardless of how Congressman Rangel used apartment 10U, at all times, Fourth Lennox charged the maximum amount of rent allowable under New York rent stabilization law.

To the extent you would like any additional information, or an affidavit attesting to the facts set forth in this letter or our previous letter dated November 14, 2008 from someone at Fourth Lennox, please let us know. If you have any questions, please contact me at the above listed number.

Very truly yours,



Robert G. Morvillo

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